

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SAMSON RESOURCES COMPANY §  
Plaintiff §  
§  
v. § CIVIL ACTION NO. \_\_\_\_\_  
§  
MB OIL & GAS, LLC §  
Defendant §

**NOTICE OF REMOVAL**

Defendant MB Oil & Gas, LLC hereby gives notice of the removal of this cause to the United States District Court for the Southern District of Texas and would show the following:

**I.**

MB Oil & Gas is a defendant in the cause of action which has been filed in 190<sup>th</sup> Judicial District Court for the Harris County, Texas, as Cause No. 2019-87041. A copy of the pleadings and process on file are attached as Exhibit "A." MB Oil & Gas received notice of this cause of action when its was served with a copy of plaintiffs' petition on December 27, 2019.

**II.**

The District Court of the United States has original jurisdiction of this action pursuant to 28 U.S.C. §1332 in that there is complete diversity between the parties and the amount in controversy, as alleged by plaintiff, exceeds the sum of \$75,000, exclusive of interest and costs. Specifically, plaintiff is resident of Oklahoma with its principal place of business in Oklahoma while MB Oil & Gas is a resident of Louisiana with its principal place of business in Louisiana.

**III.**

MB Oil & Gas now therefore desires to and hereby does remove this lawsuit to the United States District Court for the Southern District of Texas, where it might have originally been filed. Removal is authorized by 28 U.S.C. §1441(b).

WHEREFORE, defendant MB Oil & Gas, LLC gives notice that cause number 2019-87041 pending in 190<sup>th</sup> Judicial District Court for the Harris County, Texas is removed to the United States District Court for the Southern District of Texas and that such Court assumes full jurisdiction of this action as provided by law.

Respectfully submitted,

/s Robert Redfearn, Jr.

Robert L. Redfearn, Jr. (TBA # 16663950)  
Simon, Peragine, Smith & Redfearn, L.L.P.  
30th Floor, Energy Centre  
1100 Poydras Street  
New Orleans, LA 70163-3000  
Telephone: (504) 569-2030  
Telecopier: (504) 569-2999

Attorneys for MB Oil & Gas, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Pleading has been duly served on all known counsel of record by electronic mail, hand delivery or placing a copy of same in the United States mail, first class postage prepaid and properly addressed, on this 24<sup>th</sup> day of January, 2020.

/s Robert Redfearn, Jr.